

Program Abuse Prevention Plan

Program:	Oxford Oaks
Address:	225 Oxford Court, Unit A (formerly named 1030 Oxford Ave.) Pine River, MN 56474
Date plan developed:	11/28/18, Updated: 12/1/19, 12/1/20, 12/1/2021, 10/1/2022

EACH PROGRAM MUST ENSURE THAT:

- A. People receiving services are provided with an orientation to the program abuse prevention plan. This orientation must be within 24 hours of admission or within 72 hours for individuals who would benefit from a later orientation.
- B. The license holder's governing body or the governing body's delegated representative shall review the plan at least annually using the assessment factors in the plan and any substantiated maltreatment findings that occurred since the last review period. The governing body or the governing body's delegated representative shall revise the plan, if necessary, to reflect the review results.
- C. A copy of the program abuse prevention plan must be posted in a prominent place in the facility and be available, upon request, to mandated reporters, people receiving services, and legal representatives. Previous PAPPs are stored at the Main Office.
- D. If the assessment indicates that the vulnerable adult does not need specific risk reduction measures in addition to those identified in the program abuse prevention plan, the individual abuse prevention plan must document this determination.
- E. In addition to the program abuse prevention plan, an individual abuse prevention plan must be developed for each new person receiving services. A review of the individual abuse prevention plan must be done as part of the review of the program plan. The persons receiving services must participate in the development of the individual abuse prevention plan to the best of their abilities. All abuse prevention plans must be reviewed at least annually by the interdisciplinary team.

POPULATION ASSESSMENT:

1. **Age range of persons the program plans to serve:**
32 - 62 years old
2. **What specific measures has the program taken to minimize the risk of abuse to people as related to the age of people receiving services?**
PRGH Inc. provides each individual with their own bedroom. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

Each person served has their own lockable bedroom and the house is accessible for the person who uses a wheelchair. The house is handicapped accessible to code. Lift systems are available as described. The van is wheelchair accessible with a ramp and tied downs. Staff are trained on use of the lifts and van tie downs. Staff persons are always on the premises when persons served are present.

3. **Gender of persons the program plans to serve:**
PRGH Inc. PRGH Inc. serves person of male or female gender.
One woman and three men live in this home.

4. **What specific measures has the program taken to minimize the risk of abuse to people as related to the gender of people receiving services?**
PRGH Inc. provides each individual their own bedroom. There are two bathrooms with lockable doors. Staff knock before entering or opening closed doors. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

All individuals have their own bedroom with a lockable door. Both bathrooms lock from the inside. Staff close bathroom and bedroom doors when assisting individuals with personal care and dressing. When any individual exhibits sexual self-stimulation they are directed to a private bedroom, and it is explained to them why they are being directed to a private space. One individual sometimes pulls up their shirt; when this occurs, the shirt is put back into place and staff explain why they are doing this. One individual occasionally comes to the common areas naked. This individual is immediately directed back to their bedroom and prompted to get dressed.

5. **Describe the range of mental functioning of persons the program plans to serve:**
PRGH Inc. supports individuals with a diverse range of mental functioning levels including low mental functioning with severe developmental disabilities to high levels of mental functioning with mild DD.

The people served in this home have a wide range of diagnoses. Two persons have severe/profound DD and are non-verbal, one person has a moderately developmentally delayed diagnosis, and one individual is diagnosed as moderate DD with hearing impairment.

6. **What specific measure has the program take to minimize the risk of abuse to people as related to the mental functioning of people receiving services?**
PRGH Inc. staff are always present when the persons served are present unless stated in their SP Addendum. Staff are trained in the self-management assessment of each individual and know their strengths and limitations due to mental functioning. There is awake overnight staff to assist as needed during the night. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

There are two staff present most of the time during waking hours to assist persons with areas of need and provide supervision and social interaction. There is awake night staff to assist as needed during the night and to provide supervision. Alternate Overnight Supervision is provided by this staff during normal

sleeping hours. This means that this awake staff is providing supervision to this house and providing AOS awake supervision overnight in the adjacent unit in the same building. The units are connected by an internal fire door. The persons receiving AOS during normal sleep hours have high mental functioning and seldom need assistance during normal sleep hours. The individuals with mental health diagnosis receive regular psychiatric care. Target symptoms are monitored, and the individuals attend psychiatric appointments on a quarterly basis. Staff have been trained in individuals' positive support strategies.

7. Describe the range of physical and emotional health of persons the program plans to serve:

PRGH Inc. serves persons with a wide range of physical and mental health needs and diagnosis. Some homes are handicap accessible.

The physical and emotional diagnoses at this home includes the following: developmental disabilities; Down syndrome; latent hydrocephaly; OCD; anxiety; depression, SIB due to sensory dysregulation; seizure disorder; CHF and hearing impairment. One person has a wheelchair; this person is transferred via Hoyer or overhead lift system. **This person is receiving hospice services due to declining health.** Two persons are non-verbal. Two persons engage in SIB.

8. What specific measure has the program take to minimize the risk of abuse to people as related to the physical and emotional health of people receiving services served?

PRGH Inc. staff are trained on the physical and emotional health of all persons upon hire. One or two staff are on duty during waking hours and one awake staff during the night to assist with the care needed related to physical and emotional health of the persons receiving services. Additional staff is available on-call as needed to assist with behavioral or emotional health issues. Staff are trained in seizure care, medication administration, first aid, and CPR. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies. PRGH has an RN supervising health service who has knowledge of the physical and emotional health status and needs of people receiving services.

The home is handicapped accessible according to code and has overhead lifts in place for the person who is non-weight bearing. A manual Hoyer lift is available as backup. **This person is receiving hospice services due to declining health.** Three persons take psychotropic meds and see a psychiatrist regularly. The individual who experiences SIB due to sensory dysregulation has daily occupational therapy service provided to help this person cope with the condition. The home practices regular tornado and fire drills.

One person served, who has seizures, has doctor prescribed bed rails and a hospital bed to prevent falls/injury during seizures. This person also has daily physical range of motion exercises done with staff assist. Another person had several seizures then these were controlled through medication. Staff are trained in seizure response and the audio monitor is used at night. Staff are trained to recognize and address target symptoms of those taking psychotropic medication. Staff are trained on positive support strategies. Vital signs and weight are monitored on a regular basis. The home practices regular tornado and fire drills.

- 9. Describe the range of adaptive/maladaptive behavior(s) of persons the program plans to serve:**
PRGH Inc. serves persons with a wide range of adaptive/maladaptive behaviors. All persons served participate in activities of daily living and instrumental activities of daily living according to their adaptive behavior skills which includes conceptual, social, and practical skills that all people learn to function in their daily lives. Staff are trained in therapeutic intervention and positive support strategies. Staff is available to assist with maladaptive behaviors.

Two of the persons served can verbally communicate choices, opinions, concerns, or questions. Two persons served are non-verbal and staff observe for non-verbal cues that they may have pain, distress, or like/dislike of something. One person engages in SIB due to OCD, anxiety, and sensory dysregulation. One person exhibits OCD-type symptoms when anxious. Two individuals occasionally engage in physical or verbal aggression toward others. One person exhibits sexual self-stimulation or comes out of their bedroom naked and into shared spaces of the home.

- 10. What specific measures has the program taken to minimize the risk of abuse to people as related to the adaptive/maladaptive behavior(s) of the people receiving services served?**
PRGH Inc. staff are trained on the adaptive/maladaptive behaviors upon hire. Two staff are on duty during most waking hours and one awake staff during the night to assist with the care needed related to adaptive/maladaptive behaviors of the persons receiving services. Additional staff are available on-call as needed to assist with behavioral issues. Staff are trained in medication administration, first aid, and CPR and therapeutic intervention and positive support strategies. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

Three persons take psychotropic medications and see a psychiatrist regularly. Staff are trained on the communication modes of each person during orientation and get to know their personalities over time. One person has an Outcome where the person earns rewards for not displaying target symptoms. Sexual self-stimulation and nakedness in common areas is addressed by redirection to the person's private space. Positive support strategies are used to diffuse situations that may lead to aggression. The individual who experiences SIB due to sensory dysregulation has daily occupational therapy services available to help this person cope with the condition. Staff provide encouragement to the individuals.

- 11. Describe the need for specialized programs of care for persons the program plans to serve:**
PRGH Inc. serves persons with a variety of specialized care programs including but not limited to the following: specialized diets for sodium or calorie restrictions; diabetic diets and diabetic care; specialized skin care regimens; tube feeding; catheterization; mechanical lifts; accessible homes; PT/OT/Range of motion programs; seizure management; complex medical needs; cardiac conditions; visual or hearing deficits; and positive support strategies. Specialized care needs will be stated in the Support Plan.

Two individuals have seizure protocols. A mechanical lift is used. One person is on a pureed, thickened liquids diet. Specialized skin care orders are carried out as prescribed.

- 12. What specific measures has the program taken to minimize the risk of abuse to people as related to the need for specialized programs of care for people receiving services?**
PRGH Inc. staff are trained on the physical and emotional health of both persons upon hire. Two staff are on duty during most waking hours and one awake staff during the night to assist with the care needed related to needs of the persons receiving services. Additional staff is available on-call as needed to assist with any issues. Staff are trained in therapeutic intervention, medication administration, first aid, seizure protocols, CPR, and choking. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff have been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

The home is handicapped accessible according to code and has overhead lifts in place for the person who is not weight-bearing. A manual Hoyer lift is available as backup. Seizure protocols are posted in the med room.

- 13. Describe the need for specific staff training to meet individual service needs:**
Other than the areas already mentioned, and the staff training required by MN Statutes, chapter 245D, there is not additional staff training needed. Other than the areas already mentioned, and staff training required by MN Statutes, chapter 245D, there is not an additional staff training need.

- 14. What specific measures has the program taken to minimize the risk of abuse to people as related to the need for specific staff training designed to meet individual service needs?**
PRGH Inc. staff are trained on all the individual service needs of persons served during orientation. Two staff are on duty during most waking hours and one awake staff during the night to assist with the individual service needs of the persons receiving services. Additional staff is available on-call as needed to assist with any service need that arises. Staff are trained in therapeutic intervention, medication administration, seizure care, first aid, CPR and choking. Staff are trained in all areas required by MN Statutes 245D. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

Staff are trained on the use of the lifts in the home and van as well as the van tie downs.

- 15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:**

In PRGH Inc., if persons being served who have a history of previous abuse and if we would know of it, staff are informed if given consent.

There is no knowledge of previous abuse to people living in the home.

- 16. What specific measures has the program taken to minimize the risk of abuse to people as related to the knowledge of previous abuse?**
Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

N/A

PHYSICAL PLANT ASSESSMENT:

1. Describe the condition and design of the facility as it relates to safety for the people receiving services:

This home was built in 2018 and is a single story, handicapped accessible dwelling. It has 4 bedrooms, 2 bathrooms and a two-car attached garage. There is an additional attached two-person unit (Unit B) which is licensed separately. In Unit B, there is a kitchen/dining/living room space with a sliding glass door that open onto a shared courtyard. The garage is shared but there are two separate doors into the unit. There is a staff med room, bathroom and 2 bedrooms off the hall. Unit A has the severe weather shelter that is shared with Unit B; it's located in Unit A's laundry room. This is an enclosed "safe room" to use in the event of tornadoes. Unit A has track lifts in two of the bedrooms and in one bathroom. This bathroom has a large, handicapped accessible shower. The second bathroom has a bathtub with shower capabilities. Two males have bedrooms on one hall; the woman and man have a bedroom next to each other with doors opening to the main living area. Fire alarms and carbon monoxide alarms are to code. The home has been inspected by the fire marshal and meets code. Utility shut offs are marked. The home has foster care inspections as per statute. The "med room" is only accessible by staff with a key. Individual's funds are kept secure as stated in the individuals' SP Addendum. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. The home has a lock on the laundry room door for the safety of the individuals and the need to keep equipment from being broken. This is not always locked, however, if there appears to be an issue, the door can be locked. The mechanical equipment room is locked for the safety of the individuals living here. The adjoining unit, served by AOS, is accessible through an internal fire door so the staff does not need to leave the building to respond to wants or needs there. Staff are out of sight of the adjoining unit, but a doorbell is used to alert them if assistance is required. Individuals served in the adjoining unit also have access to a key to open the fire door. Both individuals in the adjoining unit require little if any assistance during normal sleep hours.

2. What specific measures has the program taken to minimize the risk of abuse to people as related to the condition and design of the facility in terms of safety for people receiving services?

Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

3. Describe any areas of the facility that are difficult to supervise:

The outside area around the house is difficult to supervise, especially the wooded area. If a person is in any room with the door closed, it is difficult to supervise them. The garage may be difficult to supervise although it does have interior and external cameras to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies.

4. What specific measures has the program taken to minimize the risk of abuse to people as related to the areas of the facility that are difficult to supervise?

Staff will go outside to check on persons receiving services if they are outside beyond the normal amount of time. When there is reason to be concerned by the sounds, or lack of sounds, the staff will knock on the bedroom or bathroom door to check on the person. During the hours of sleep, staff will

monitor unusual sounds in the home. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. The adjoining unit, served by AOS, is accessible through an internal fire door so the staff does not need to leave the building to respond to wants or needs there. Staff are out of sight of the adjoining unit, but a doorbell is used to alert them if assistance is required. Both individuals in the adjoining unit require little if any assistance during normal sleep hours. An audio monitor is available to assist if there are short-term needs (i.e., seizures or illness). Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act and this PAPP, and will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

ENVIRONMENTAL ASSESSMENT:

1. Describe the location of the facility including information about the neighborhood and community that the facility is located:

The Oxford Oak SLS is located in Pine River, a town of 975 people. It is in a residential area, on a cul-de-sac, off a residential street with light traffic. It has a few neighboring homes. The town has many local services used by the persons served including library, grocery store, beauty/barber shops, clinic, dentist, eye doctor, churches, banks, DAC, and other stores. The closest hospital is about 30 miles away. There is a local ambulance and fire department. Air ambulance service is available to larger hospitals. The community includes supported employment through the Pine River Area DAC.

2. What specific measures has the program taken to minimize the risk of abuse to people as related to the location of the facility, including factors about the neighborhood and community?

Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

The people we serve are always accompanied by staff in the community unless the Support Team has determined it is a reasonable risk for the person to be alone in the community for a designated amount of time or activity. Transportation is provided to and from the community as needed. Community reports of concern about a person we serve are investigated. Staff are aware of what is happening around the home to insure people we serve are safe outdoors.

3. Describe the type of grounds and terrain that surround the facility: The grounds around the home have a parking area and a grassy yard. The home is on a shared cul-de-sac. There are trees in the yard and there's a wooded area on two sides of the home.

4. What specific measures has the program taken to minimize the risk of abuse to people as related to the type of grounds and terrain that surround the facility?

Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff have been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

The grounds are kept free of debris and snow. Staff assist the people we serve when the terrain could be slippery due to the weather conditions. The driveway is plowed of snow in the winter. Accesses in and out of the home are shoveled if there's snow.

5. Describe the type of internal programming provided at the program:

Each person we serve has individual supports to develop their skills and abilities to the best of their abilities. Each person served participates in a day program. People we serve are supported to meet their individual needs and preferences and to insure their health and safety. Internal programming includes residential skills training and activities of daily living including but not limited to dressing, bathing, toileting, and meal preparation, banking, shopping, and communication. Staff provide supervision and assistance to ensure health and safety.

6. What specific measures has the program taken to minimize the risk of abuse to people through the type of internal programming provided at the program?

Staff are trained on meeting each person served needs, preferences, and to ensure their safety and health. Staff will assist people in being as independent as possible in the activities of daily living. Staff are trained in CPR, first aid and all other required topics according to MN statute 245D. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

Staff will assist with activities of daily living and encourage as much independence as possible in all skill areas. Staff are trained on meeting everyone's needs, preferences, and to ensure their safety and health.

7. Describe the program's staffing pattern: The home has double coverage at most times when persons we serve are awake; in the morning when they get up, in the afternoon after work, and into the evening on weekdays and some weekends from midmorning to evening. During the overnight hours, one staff person works alone and is awake. One staff person works Monday-Fridays from 2:00PM til 10:00PM. One staff person works split shift: 6:00AM-9:00AM and 2:30PM-7:30PM. Weekend shift is 8:00AM-8:00PM with occasional second staff 10:00A-7:00PM. The overnights are 10-hour shifts Monday-Thursday and twelve-hour shifts Friday-Sunday. The overnight person provides AOS to the adjoining 2-person unit.

8. What specific measures has the program taken to minimize the risk of abuse to people through the program's staffing pattern?

The program provides two staff during most waking hours to assure that medical appointments, daily living activities, and other preferred activities can be accommodated. Two people are able to manage a crisis or emergency by helping each other and additional support can be sought as needed. The program has an on-call supervisor in case a staff person has an emergency. The awake staff during the overnight shift assures that cares and support are provided as needed. The adjoining unit, served by AOS, is accessible through an internal fire door so the staff does not need to leave the building to respond to wants or needs there. Staff are out of sight of the adjoining unit, but a doorbell is used to alert them if assistance is required. Both individuals in the adjoining unit require little if any assistance during normal sleep hours. Staff are trained in CPR, first aid and all other required topics according to MN statute 245D. Staff are trained on the self-management assessments, *Support Plan, Support Plan Addendum, and IAPP* of each person. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

